

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his )  
capacity as ATTORNEY GENERAL )  
OF THE STATE OF OKLAHOMA and )  
OKLAHOMA SECRETARY OF THE )  
ENVIRONMENT C. MILES TOLBERT, )  
in his capacity as the )  
TRUSTEE FOR NATURAL RESOURCES )  
FOR THE STATE OF OKLAHOMA, )

Plaintiff, )

vs. )

TYSON FOODS, INC., et al, )

Defendants. )

4:05-CV-00329-TCK-SAJ

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THE VIDEOTAPED DEPOSITION OF  
MONTY HENDERSON, produced as a witness on behalf  
of the Plaintiff in the above styled and numbered  
cause, taken on the 20th day of August, 2008, in the  
City of Fayetteville, County of Washington, State of  
Arkansas, before me, Lisa A. Steinmeyer, a Certified  
Shorthand Reporter, duly certified under and by  
virtue of the laws of the State of Oklahoma.

1 A No.

2 Q They were active in the organization when you  
3 came on board fourteen years ago?

4 A Yes. They were a member when I came on board.

5 Q Have you attended any of their seminars? 09:33AM

6 A Yes.

7 Q In what areas?

8 A Poultry processing. It's been a few years  
9 since I have, but I've attended the processing  
10 seminars. I've also attended some of the live 09:33AM  
11 production seminars that were held several years  
12 ago.

13 Q When employees do attend these seminars, is  
14 there any process at George's for disseminating the  
15 information that they receive in the course of going 09:33AM  
16 to them?

17 A There's not a formal process for disseminating  
18 the information. However, if a plant manager  
19 attends a seminar that's relating to processing of  
20 chickens, that he would come back and I would assume 09:34AM  
21 that he would normally disseminate any information  
22 that he received that's pertinent to his processing  
23 plant to his subordinates.

24 Q And in the grow operations, I take it that  
25 there would be some at least informal sharing of 09:34AM

1 that information?

2 A I would assume so.

3 Q Is there any expectation that that information  
4 will be shared?

5 MR. GRAVES: Object to the form. 09:34AM

6 A I would assume that that happens. I've never  
7 really thought about that from an expectation  
8 standpoint.

9 Q Turn to the environmental information, which  
10 is -- or literature relating to environmental issues 09:35AM  
11 that comes out of U. S. Poultry & Egg. Do you make  
12 any effort to stay knowledgeable in that area?

13 A Any information that comes out of U. S.  
14 Poultry & Egg, I try to read and at least have a  
15 cursory knowledge of any events or any issues that 09:35AM  
16 are pertinent to our industry at the time.

17 Q And that's been true throughout your tenure at  
18 George's?

19 A Yes. I probably don't see it all, all the  
20 information that comes out. 09:35AM

21 Q I hand you Plaintiff's Exhibit 1. I've handed  
22 you what has been marked as Henderson Deposition  
23 Exhibit 1. Do you recognize that?

24 A I do not.

25 Q Do you know a Professor Phillip Moore? 09:36AM